

<i>SERFF Tracking Number:</i>	<i>AMNA-126989230</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>American National Insurance Company</i>	<i>State Tracking Number:</i>	<i>47732</i>
<i>Company Tracking Number:</i>	<i>ASIA 2011</i>		
<i>TOI:</i>	<i>A07I Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A07I.001 Equity Indexed</i>
<i>Product Name:</i>	<i>ASIA 2011</i>		
<i>Project Name/Number:</i>	<i>/</i>		

Filing at a Glance

Company: American National Insurance Company

Product Name: ASIA 2011

SERFF Tr Num: AMNA-126989230 State: Arkansas

TOI: A07I Individual Annuities - Special

SERFF Status: Closed-Accepted State Tr Num: 47732

For Informational Purposes

Sub-TOI: A07I.001 Equity Indexed

Co Tr Num: ASIA 2011

State Status: Filed-Closed

Filing Type: Form

Reviewer(s): Linda Bird

Author: Tyra Reed

Disposition Date: 01/20/2011

Date Submitted: 01/18/2011

Disposition Status: Accepted For

Informational Purposes

Implementation Date Requested: 03/01/2011

Implementation Date:

State Filing Description:

General Information

Project Name:

Status of Filing in Domicile: Pending

Project Number:

Date Approved in Domicile:

Requested Filing Mode: Informational

Domicile Status Comments:

Explanation for Combination/Other:

Market Type: Individual

Submission Type: New Submission

Individual Market Type:

Overall Rate Impact:

Filing Status Changed: 01/20/2011

State Status Changed: 01/20/2011

Deemer Date:

Created By: Tyra Reed

Submitted By: Tyra Reed

Corresponding Filing Tracking Number: USPH-

6NAQGC857/00-00/00-03/00

Filing Description:

RE:

American National Insurance Company (NAIC: 60739 FEIN: 74-0484030)

Informational Update of Memorandum of Variable Material for Specifications Pages used with the following previously approved contracts:

Form ASIA7-NQ - Single Premium Indexed Deferred Annuity

Form ASIA7-PQ – Single Premium Indexed Deferred Annuity

Form ASIA10-NQ – Single Premium Indexed Deferred Annuity

Form ASIA10-PQ – Single Premium Indexed Deferred Annuity

SERFF Tracking Number: AMNA –126989230

SERFF Tracking Number: AMNA-126989230 State: Arkansas
Filing Company: American National Insurance Company State Tracking Number: 47732
Company Tracking Number: ASIA 2011
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: ASIA 2011
Project Name/Number: /

Company Tracking Number: ASIA 2011
Requested Effective Date: March 1, 2011

Sir or Madam

This is an informational submission via a revised Memorandum of Variable Material to update the items described below. These changes will take effect for all newly issued contracts on or after March 1, 2011. No other changes than those identified below have been made.

1.)Beneficiary.

The explanation of the Beneficiary was previously identified as a variable field however; the Beneficiary field will display the text as shown and will not vary. The sample data pages provided under the Supporting Documentation tab show the brackets in blue, indicating our removal of the brackets.

2.)Declared Rate Interest Crediting Method.

This title was previously identified as variable material however; this title is applicable to all contracts and will always be displayed. The sample data pages provided under the Supporting Documentation tab show the brackets in blue, indicating our removal of the brackets.

3.)S&P 500® Index One-Year Interest Crediting Method / Minimum Guaranteed Renewal Rates.

The values for Floor, Cap, and Participation Rate were not previously denoted as variable material. These values will vary as provided within the revised Memorandum of Variable Material and only appear when the S&P 500® Index One-Year Interest Crediting Method is elected. The sample data pages provided under the Supporting Documentation tab show the brackets in red, indicating the addition of brackets.

4.)S&P 500® Index One-Year Average Interest Crediting Method.

The title was not previously identified as a variable item however; this title will only appear to contracts utilizing this crediting method. Additionally, the Rates for first Contract Year and the Minimum Guaranteed Renewal Rate information will also only appear when the S&P 500® Index One-Year Average Interest Crediting Method is elected.

While some of the related values for this crediting method were bracketed originally, the values for Floor, Cap, and Participation Rate under the Minimum Guaranteed Renewal Rate section were not previously identified as variable. These values will vary as provided within the revised Memorandum of Variable Material.

The sample data pages provided under the Supporting Documentation tab shows the brackets for these items in red, indicating the addition of brackets.

5.)Enhanced Death Benefit Rider.

SERFF Tracking Number: AMNA-126989230 State: Arkansas
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Product Name: ASIA 2011
Project Name/Number: /

The Rider Annual Premium Rate and Enhanced Death Benefit Rider Percentage were filed as variable material. We believe additional clarification regarding the variability of the rates associated with these items is necessary.

When the Enhanced Death Benefit Rider is applicable, both the Rider Annual Premium Rate and Enhanced Death Benefit Rider Percentage fields will be displayed, each with the applicable rate. Those rates will vary as provided within the revised Memorandum of Variable Material. To clarify such variability between the rate and the title, brackets were added around the rate. The sample data pages provided under the supporting Documentation tab show the placement of the original brackets in black, and the addition of the clarifying brackets in red.

6.)Lifetime Income Rider.

The Rider Annual Premium Rate and Lifetime Income Percentage were filed as variable material. We believe additional clarification regarding the variability of the rates associated with these items is necessary.

When the Lifetime Income Rider is applicable, both the Rider Annual Premium Rate and Lifetime Income Percentage fields will be displayed, each with the applicable rates. Those rates will vary as provided within the revised Memorandum of Variable Material. To clarify such variability between the rate and title, brackets were added around the rate. The sample data pages provided under the Supporting Documentation tab show the placement of the original brackets in black, and the addition of the clarifying brackets in red.

7.)Surrender Charge Percentage.

The Surrender Charge Percentage chart for the 7-year products contained a typographical error for year 5. The correct percentage for year 5 is 4%, and the sample data pages provided have been updated to reflect the correct rate. The originally submitted data pages displayed 7%. Surrenders in year 5 for existing contract holders have been processed to the contract holder's benefit at the correct rate of 4%.

8.)The footnote regarding the Standard & Poor's® index has been updated as required by our contractual agreement with the S&P®. This statement was filed as variable under the original submission. The sample data pages have been updated with the current language for your records.

The above referenced annuity contracts and data pages were approved on 6/1/2006 under SERFF Tracking Number USPH-6NAQGC857/00-00/00-03/00 and State Tracking Number 32523.

Additional information regarding this filing is provided / attached below:

- Sample specifications pages, showing updated information ("red-lined") have been attached under the Supporting Documentation tab.
- The required filing fee in the amount of \$ 400.00 has been submitted via EFT. This amount is the retaliatory fee.
- A copy of the original actuarial memorandum has been provided
- Any requirement for a third party authorization has been bypassed, as this is not a third-party filing

SERFF Tracking Number:	AMNA-126989230	State:	Arkansas
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Company Tracking Number:	ASIA 2011		
TOI:	A071 Individual Annuities - Special	Sub-TOI:	A071.001 Equity Indexed
Product Name:	ASIA 2011		
Project Name/Number:	/		

As you complete your review of this filing, should you have any questions or require any additional information or documentation, please let me know!

Company and Contact

Filing Contact Information

Tyra Reed, Policy Analyst	tyra.reed@anico.com
One Moody Plaza	409-763-1112 [Phone] 5222 [Ext]
Product Development--14th Floor	409-766-6933 [FAX]
Galveston, TX 77550	

Filing Company Information

American National Insurance Company	CoCode: 60739	State of Domicile: Texas
One Moody Plaza	Group Code: 408	Company Type:
Galveston, TX 77550	Group Name:	State ID Number:
(409) 763-4661 ext. [Phone]	FEIN Number: 74-0484030	

Filing Fees

Fee Required?	Yes
Fee Amount:	\$400.00
Retaliatory?	Yes
Fee Explanation:	
Per Company:	No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
American National Insurance Company	\$400.00	01/18/2011	43859456

<i>SERFF Tracking Number:</i>	<i>AMNA-126989230</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Project Name/Number:</i>	<i>/</i>		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Accepted For Linda Bird Informational Purposes		01/20/2011	01/20/2011

<i>SERFF Tracking Number:</i>	<i>AMNA-126989230</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>American National Insurance Company</i>	<i>State Tracking Number:</i>	<i>47732</i>
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<i>Project Name/Number:</i>	<i>/</i>		

Disposition

Disposition Date: 01/20/2011

Implementation Date:

Status: Accepted For Informational Purposes

Comment:

Rate data does NOT apply to filing.

<i>SERFF Tracking Number:</i>	<i>AMNA-126989230</i>	<i>State:</i>	<i>Arkansas</i>
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<i>Product Name:</i>	<i>ASIA 2011</i>		
<i>Project Name/Number:</i>	<i>/</i>		

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	Revised Variable Material Memoranda		Yes
Supporting Document	Sample Data Pages (w/changes marked)		Yes

SERFF Tracking Number:	AMNA-126989230	State:	Arkansas
Filing Company:	American National Insurance Company	State Tracking Number:	47732
Company Tracking Number:	ASIA 2011		
TOI:	A071 Individual Annuities - Special	Sub-TOI:	A071.001 Equity Indexed
Product Name:	ASIA 2011		
Project Name/Number:	/		

Supporting Document Schedules

	Item Status:	Status
		Date:
Satisfied - Item:	Revised Variable Material Memoranda	
Comments:		
Attachments:		
	Memorandum of Variable Material - Form ASIA7.pdf	
	Memorandum of Variable Material - Form ASIA10.pdf	

	Item Status:	Status
		Date:
Satisfied - Item:	Sample Data Pages (w/changes marked)	
Comments:		
Attachments:		
	Sample Data Page - 7NQ.pdf	
	Sample Data Page - 7PQ.pdf	
	Sample Data Page - 10NQ.pdf	
	Sample Data Page - 10PQ.pdf	

American National Insurance Company
Memorandum of Variable Material
Single Premium Indexed Deferred Annuity
Forms ASIA7-NQ, ASIA7-PQ
January 10, 2011

A. Purpose and Scope

The purpose of this memorandum is to identify the variable material used in the above contract forms and the range of values that will be used without prior notification or approval. The variable material contained in these contract forms is denoted by the use of brackets. For a particular contract, all of these items are set at issue and will not change over the life of that contract. The individual fields are described in the order in which they appear in the contract. This Memorandum of Variable Material will apply to all contracts issued on or after March 1, 2011.

B. Variable Material

1. Cover Page

Annuitant: We will display the name of the person so designated in the application.

Contract Number: We will display a unique contract number that is automatically assigned by our administrative system.

Home Office Address: We will display the current address of the company's home office.

Officers' Signatures and Titles: We will display the signatures and titles of two current officers.

2. Data Page

The following values are determined based on the information provided and elections made by the contract owner in the application or information generated by our administrative systems when a contract is issued.

Owner: We will display the name of the person so designated. When the Owner is a non-natural person, the name of the applicable entity will display.

Contract Number: We will display a unique contract number that is automatically assigned by our administrative system (same as cover page).

Age of Owner: We will display the Owner's age on their last birth date measured on the issue date of the contract. The issue age range for these contracts is 0 to 85. If the owner is not a natural person, this field will not display.

Date of Issue: We will display the date the contract is issued.

Annuitant: We will display the name of the person so designated (same as cover page).

Maturity Date: The maturity date will be the contract anniversary following the annuitant's 95th birthday.

Age of Annuitant: We will display the annuitant's age on their last birth date measured on the issue date of the contract. The issue age range for these contracts is 0 to 85.

Single Premium: We will display the total amount received as the single premium. The maximum single premium is \$1,000,000, without prior approval from the home office. The minimum single premium is \$5,000 for contract form ASIA7-NQ and \$4,000 for contract form ASIA7-PQ.

Memorandum of Variable Material for Forms ASIA7-NQ, ASIA7-PQ (continued)
January 10, 2011

Net Premium: We will display the single premium minus any applicable premium taxes deducted by the company. For states that do not currently charge premium taxes, this amount will be the same as the single premium.

Specifications:

The following values will be determined periodically by the company to maintain our desired competitive position, risk profile, and expected profitability. These values will be determined on the issue date of the contract based on a combination of the issue date and the date the application was signed.

Premium Enhancement Amount: We will display the net premium times the premium enhancement percentage.

Premium Enhancement Percentage: The current value is 0%, subject to a minimum value of 0% and a maximum value of 10%.

Net Consideration Percentage: The current value is 90%, subject to a minimum value of 87.5% and a maximum value of 100%.

Minimum Guaranteed Interest Rate for Minimum Guaranteed Surrender Value:

For Declared Interest Rate Interest Crediting Method: This value will not be less than nonforfeiture interest rate on the issue date of the contract calculated as described in the actuarial memorandum.

For Indexed Minimum Interest Crediting Method: This value will not be less than the nonforfeiture interest rate applicable to contracts with substantive participation in an equity indexed benefit on the issue date of the contract calculated as described in the actuarial memorandum.

Endorsements:

The following values will be determined periodically by the company to maintain our desired competitive position, risk profile, and expected profitability. These values will be determined on the issue date of the contract based on a combination of the issue date and the date the application was signed.

Declared Rate Interest Crediting Method Endorsement:

Interest Rate for first Contract Year: This value will not be less than the minimum declared rate for the declared rate interest crediting method endorsement.

Minimum Declared Rate: The range of values for this field is 1 to 20%.

S&P 500[®] Index One-Year Interest Crediting Method Endorsement:

This section will appear whenever the S&P 500[®] Index One-Year Interest Crediting Method endorsement is attached to the contract.

Rates for First Contract Year:

Floor: The range of values for this field is 0 to 5%.

Cap: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

Minimum Guaranteed Renewal Rates:

Memorandum of Variable Material for Forms ASIA7-NQ, ASIA7-PQ (continued)
January 10, 2011

Floor: The range of values for this field is 0 to 5%.

Cap, Contract Years 2-7: The range of values for this field is 1 to 20%.

Cap, Thereafter: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

S&P 500® Index One-Year Average Interest Crediting Method:

This section will appear whenever the S&P 500® Index One-Year Average Interest Crediting Method endorsement is attached to the contract.

Rates for First Contract Year:

Floor: The range of values for this field is 0 to 5%.

Cap: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

Minimum Guaranteed Renewal Rates:

Floor: The range of values for this field is 0 to 5%.

Cap, Contract Years 2-7: The range of values for this field is 1 to 20%.

Cap, Thereafter: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

Riders:

Riders: This section header will appear whenever one or more optional riders are attached to the contract.

Return of Premium Rider: This text will appear whenever the return of premium rider has been elected and attached to the contract.

Enhanced Death Benefit Rider: This text will appear whenever the enhanced death benefit rider has been elected and attached to the contract.

Lifetime Income Rider: This text will appear whenever the lifetime income rider has been elected and attached to the contract.

The following values will be determined periodically by the company to maintain our desired competitive position, risk profile, and expected profitability. These values will be determined on the issue date of the contract based on a combination of the issue date and the date the application was signed. These values will only appear if the corresponding rider has been elected and attached to the contract.

Enhanced Death Benefit Rider Annual Premium Rate: The current value is 0.25%, subject to a minimum value of 0% and a maximum value of 5%.

Enhanced Death Benefit Rider Percentage: The current value is 45%, subject to a minimum value of 5% and a maximum value of 50%.

Memorandum of Variable Material for Forms ASIA7-NQ, ASIA7-PQ (continued)
January 10, 2011

Lifetime Income Rider Annual Premium Rate: The current value is 0.40%, subject to a minimum value of 0% and a maximum value of 5%.

Lifetime Income Percentage: The current values are as follows: income commencing on or after age 60 and before age 70: 5.00%, income commencing on or after age 70 and before age 80: 6.00%, income commencing on or after age 80: 7.00%. All age groups are subject to a minimum value of 1% and a maximum value of 20%.

Standard & Poor's Statement:

The current statement is: "Standard & Poor's[®]", "S&P[®]", "S&P 500[®]", and "Standard & Poor's 500[™]" are trademarks of Standard & Poor's Financial Services LLC ("Standard & Poor's") and have been licensed for use by American National Insurance Company. This product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing this product

This disclosure language is required whenever the use of the S&P 500[®] Index is referenced. This language is provided by Standard & Poor's and updated periodically. This disclosure will be updated in conjunction with any updates in the disclosure as provided by Standard & Poor's.

C. Certifications

- The final form issued to the consumer will not contain brackets denoting variable material.
- The use of variable material will be administered in a uniform and non-discriminatory manner, and will not result in unfair discrimination.
- Where text is variable, only the text included in this memorandum will be allowed to be used on the referenced forms received by consumers.
- Any changes to the variable material or the permissible ranges of values will be submitted for approval prior to implementation.

American National Insurance Company
Memorandum of Variable Material
Single Premium Indexed Deferred Annuity
Forms ASIA10-NQ, ASIA10-PQ
January 10, 2011

A. Purpose and Scope

The purpose of this memorandum is to identify the variable material used in the above contract forms and the range of values that will be used without prior notification or approval. The variable material contained in these contract forms is denoted by the use of brackets. For a particular contract, all of these items are set at issue and will not change over the life of that contract. The individual fields are described in the order in which they appear in the contract. This Memorandum of Variable Material will apply to all contracts issued on or after March 1, 2011.

B. Variable Material

1. Cover Page

Annuitant: We will display the name of the person so designated in the application.

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Home Office Address: We will display the current address of the company's home office.

Officers' Signatures and Titles: We will display the signatures and titles of two current officers.

2. Data Page

The following values are determined based on the information provided and elections made by the contract owner in the application or information generated by our administrative systems when a contract is issued.

Owner: We will display the name of the person so designated. When the Owner is a non-natural person, the name of the applicable entity will display.

Contract Number: We will display a unique contract number that is automatically assigned by our administrative system (same as cover page).

Age of Owner: We will display the Owner's age on their last birth date measured on the issue date of the contract. The issue age range for these contracts is 0 to 85. If the owner is not a natural person, this field will not display.

Date of Issue: We will display the date the contract is issued.

Annuitant: We will display the name of the person so designated (same as cover page).

Maturity Date: The maturity date will be the contract anniversary following the annuitant's 95th birthday.

Age of Annuitant: We will display the annuitant's age on their last birth date measured on the issue date of the contract. The issue age range for these contracts is 0 to 85.

Single Premium: We will display the total amount received as the single premium. The maximum single premium is \$1,000,000, without prior approval from the home office. The minimum single premium is \$5,000 for contract form ASIA10-NQ and \$4,000 for contract form ASIA10-PQ.

Memorandum of Variable Material for Forms ASIA10-NQ, ASIA10-PQ (continued)
January 10, 2011

Net Premium: We will display the single premium minus any applicable premium taxes deducted by the company. For states that do not currently charge premium taxes, this amount will be the same as the single premium.

Specifications:

The following values will be determined periodically by the company to maintain our desired competitive position, risk profile, and expected profitability. These values will be determined on the issue date of the contract based on a combination of the issue date and the date the application was signed.

Premium Enhancement Amount: We will display the net premium times the premium enhancement percentage.

Premium Enhancement Percentage: The current value is 0%, subject to a minimum value of 0% and a maximum value of 10%.

Net Consideration Percentage: The current value is 90%, subject to a minimum value of 87.5% and a maximum value of 100%.

Minimum Guaranteed Interest Rate for Minimum Guaranteed Surrender Value:

For Declared Interest Rate Interest Crediting Method: This value will not be less than nonforfeiture interest rate on the issue date of the contract calculated as described in the actuarial memorandum.

For Indexed Minimum Interest Crediting Method: This value will not be less than the nonforfeiture interest rate applicable to contracts with substantive participation in an equity indexed benefit on the issue date of the contract calculated as described in the actuarial memorandum.

Endorsements:

The following values will be determined periodically by the company to maintain our desired competitive position, risk profile, and expected profitability. These values will be determined on the issue date of the contract based on a combination of the issue date and the date the application was signed.

Declared Rate Interest Crediting Method Endorsement:

Interest Rate for first Contract Year: This value will not be less than the minimum declared rate for the declared rate interest crediting method endorsement.

Minimum Declared Rate: The range of values for this field is 1 to 20%.

S&P 500® Index One-Year Interest Crediting Method Endorsement:

This section will appear whenever the S&P 500® Index One-Year Interest Crediting Method endorsement is attached to the contract.

Rates for First Contract Year:

Floor: The range of values for this field is 0 to 5%.

Cap: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

Minimum Guaranteed Renewal Rates:

Memorandum of Variable Material for Forms ASIA10-NQ, ASIA10-PQ (continued)
January 10, 2011

Floor: The range of values for this field is 0 to 5%.

Cap, Contract Years 2-7: The range of values for this field is 1 to 20%.

Cap, Thereafter: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

S&P 500® Index One-Year Average Interest Crediting Method:

This section will appear whenever the S&P 500® Index One-Year Average Interest Crediting Method endorsement is attached to the contract.

Rates for First Contract Year:

Floor: The range of values for this field is 0 to 5%.

Cap: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

Minimum Guaranteed Renewal Rates:

Floor: The range of values for this field is 0 to 5%.

Cap, Contract Years 2-7: The range of values for this field is 1 to 20%.

Cap, Thereafter: The range of values for this field is 1 to 20%.

Participation Rate: The range of values for this field is 20 to 100%.

Riders:

Riders: This section header will appear whenever one or more optional riders are attached to the contract.

Return of Premium Rider: This text will appear whenever the return of premium rider has been elected and attached to the contract.

Enhanced Death Benefit Rider: This text will appear whenever the enhanced death benefit rider has been elected and attached to the contract.

Lifetime Income Rider: This text will appear whenever the lifetime income rider has been elected and attached to the contract.

The following values will be determined periodically by the company to maintain our desired competitive position, risk profile, and expected profitability. These values will be determined on the issue date of the contract based on a combination of the issue date and the date the application was signed. These values will only appear if the corresponding rider has been elected and attached to the contract.

Enhanced Death Benefit Rider Annual Premium Rate: The current value is 0.25%, subject to a minimum value of 0% and a maximum value of 5%.

Enhanced Death Benefit Rider Percentage: The current value is 45%, subject to a minimum value of 5% and a maximum value of 50%.

Memorandum of Variable Material for Forms ASIA10-NQ, ASIA10-PQ (continued)
January 10, 2011

Lifetime Income Rider Annual Premium Rate: The current value is 0.40%, subject to a minimum value of 0% and a maximum value of 5%.

Lifetime Income Percentage: The current values are as follows: income commencing on or after age 60 and before age 70: 5.00%, income commencing on or after age 70 and before age 80: 6.00%, income commencing on or after age 80: 7.00%. All age groups are subject to a minimum value of 1% and a maximum value of 20%.

Standard & Poor's Statement:

The current statement is: "Standard & Poor's[®]", "S&P[®]", "S&P 500[®]", and "Standard & Poor's 500[™]" are trademarks of Standard & Poor's Financial Services LLC ("Standard & Poor's") and have been licensed for use by American National Insurance Company. This product is not sponsored, endorsed, sold or promoted by Standard & Poor's and Standard & Poor's makes no representation regarding the advisability of purchasing this product

This disclosure language is required whenever the use of the S&P 500[®] Index is referenced. This language is provided by Standard & Poor's and updated periodically. This disclosure will be updated in conjunction with any updates in the disclosure as provided by Standard & Poor's.

C. Certifications

- The final form issued to the consumer will not contain brackets denoting variable material.
- The use of variable material will be administered in a uniform and non-discriminatory manner, and will not result in unfair discrimination.
- Where text is variable, only the text included in this memorandum will be allowed to be used on the referenced forms received by consumers.
- Any changes to the variable material or the permissible ranges of values will be submitted for approval prior to implementation.

DATA PAGE

OWNER	[ANNUITANT]	[12345678]	CONTRACT NUMBER
AGE OF OWNER	[35]	[MARCH 1, 2011]	DATE OF ISSUE
ANNUITANT	[JOHN DOE]	[MARCH 1, 2072]	MATURITY DATE
AGE OF ANNUITANT	[35]		
BENEFICIARY	[AS STATED IN COPY OF APPLICATION ATTACHED UNLESS SUBSEQUENTLY CHANGED IN COMPLIANCE WITH CONTRACT PROVISIONS]		

FORM	PLAN	SINGLE PREMIUM	NET PREMIUM
Form ASIA7-NQ	SINGLE PREMIUM FIXED AND INDEXED DEFERRED ANNUITY	[\$10,000]	[\$10,000]

SPECIFICATIONS

PREMIUM ENHANCEMENT AMOUNT	[\$0]
PREMIUM ENHANCEMENT PERCENTAGE	[0%]
NET CONSIDERATION PERCENTAGE	[90%]
MINIMUM GUARANTEED INTEREST RATE FOR MINIMUM GUARANTEED SURRENDER VALUE	
For Declared Rate Interest Crediting Method	[1.00%]
For Indexed Minimum Interest Crediting Method	[1.00%]

ENDORSEMENTS[DECLARED RATE INTEREST CREDITING METHOD]

Interest Rate for first Contract Year: [2.50%]
Minimum Declared Rate: [1.00%]

[S&P 500® INDEX ONE-YEAR INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[3.50%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-7 [1%]
Thereafter	[1%]
Participation Rate	[100%]

[S&P 500® INDEX ONE-YEAR AVERAGE INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[3.50%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-7 [1%]
Thereafter	[1%]
Participation Rate	[100%]

[RIDERS]

[Return of Premium Rider]

[Enhanced Death Benefit Rider]

[Rider Annual Premium Rate: [0.25%]]

[Enhanced Death Benefit Rider Percentage: [45.0%]]

[Lifetime Income Rider]

[Rider Annual Premium Rate: [0.40%]]

[Lifetime Income Percentage:

income commencing on or after age 60 and before age 70: [5.00%]

income commencing on or after age 70 and before age 80: [6.00%]

income commencing on or after age 80: [7.00%]]

TABLE OF GUARANTEED SURRENDER VALUES

Based on a Net Premium of \$10,000 at the Date of Issue

Contract Years	Guaranteed Surrender Value
1	9,935.00
2	9,870.00
3	9,805.00
4	9,740.00
5	9,675.00
6	9,610.00
7	9,545.00
8	9,545.00
9	9,480.00
10	9,415.00
11	9,391.02
12	9,426.43
13	9,462.84
14	9,500.27
15	9,538.72
16	9,578.21
17	9,618.74
18	9,660.33
19	9,702.98
20	9,746.71

SURRENDER CHARGE SCHEDULE

Contract Years	Surrender Charge Percentage
1	7%
2	7%
3	6%
4	5%
5	4%
6	3%
7	2%
8	0%

The values in the table assume no Withdrawals or premium tax, and assume that 100% of the Annuity Value is invested in an account(s) under this contract that use an Indexed Interest Crediting Method. To determine the guaranteed Surrender Value for Net Premiums other than \$10,000, divide the Net Premium by \$10,000 and multiply the result by the appropriate guaranteed Surrender Value above. To the extent that you allocate premiums to the Declared Rate Interest Crediting Method the guaranteed Surrender Value will be greater.

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DATA PAGE

OWNER	[ANNUITANT]	[12345678]	CONTRACT NUMBER
AGE OF OWNER	[35]	[JANUARY 1, 2000]	DATE OF ISSUE
ANNUITANT	[JOHN DOE]	[JANUARY 1, 2061]	MATURITY DATE
AGE OF ANNUITANT	[35]		
BENEFICIARY	[AS STATED IN COPY OF APPLICATION ATTACHED UNLESS SUBSEQUENTLY CHANGED IN COMPLIANCE WITH CONTRACT PROVISIONS]		

FORM	PLAN	SINGLE PREMIUM	NET PREMIUM
Form ASIA7-PQ	SINGLE PREMIUM FIXED AND INDEXED DEFERRED ANNUITY	[\$10,000]	[\$10,000]

SPECIFICATIONS

PREMIUM ENHANCEMENT AMOUNT	[\$500]
PREMIUM ENHANCEMENT PERCENTAGE	[5%]
NET CONSIDERATION PERCENTAGE	[90%]
MINIMUM GUARANTEED INTEREST RATE FOR MINIMUM GUARANTEED SURRENDER VALUE	
For Declared Rate Interest Crediting Method	[2.85%]
For Indexed Minimum Interest Crediting Method	[1.85%]

ENDORSEMENTS[DECLARED RATE INTEREST CREDITING METHOD]

Interest Rate for first Contract Year: [4.00%]
Minimum Declared Rate: [2.00%]

[S&P 500® INDEX ONE-YEAR INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[6.5%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-7 [4%]
Thereafter	[2%]
Participation Rate	[100%]

[S&P 500® INDEX ONE-YEAR AVERAGE INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[7.5%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-7 [5%]
Thereafter	[3%]
Participation Rate	[100%]

[RIDERS]

[Return of Premium Rider]

[Enhanced Death Benefit Rider]

[Rider Annual Premium Rate: [0.25%]]

[Enhanced Death Benefit Rider Percentage: [45.0%]]

[Lifetime Income Rider]

[Rider Annual Premium Rate: [0.40%]]

[Lifetime Income Percentage:

income commencing on or after age 60 and before age 70: [5.00%]

income commencing on or after age 70 and before age 80: [6.00%]

income commencing on or after age 80: [7.00%]]

TABLE OF GUARANTEED SURRENDER VALUES

Based on a Net Premium of \$10,000 at the Date of Issue

Contract Years	Guaranteed Surrender Value
1	9,765.00
2	9,838.50
3	9,933.00
4	10,027.50
5	9,863.88
6	10,216.50
7	10,311.00
8	10,500.00
9	10,614.31
10	10,810.68
11	11,010.67
12	11,214.37
13	11,421.84
14	11,633.14
15	11,848.35
16	12,067.55
17	12,290.80
18	12,518.18
19	12,749.76
20	12,985.63

SURRENDER CHARGE SCHEDULE

Contract Years	Surrender Charge Percentage
1	7%
2	7%
3	6%
4	5%
5	4%
6	3%
7	2%
8	0%

The values in the table assume no Withdrawals or premium tax, and assume that 100% of the Annuity Value is invested in an account(s) under this contract that use an Indexed Interest Crediting Method. To determine the guaranteed Surrender Value for Net Premiums other than \$10,000, divide the Net Premium by \$10,000 and multiply the result by the appropriate guaranteed Surrender Value above. To the extent that you allocate premiums to the Declared Rate Interest Crediting Method the guaranteed Surrender Value will be greater.

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DATA PAGE

OWNER	[ANNUITANT]	[12345678]	CONTRACT NUMBER
AGE OF OWNER	[35]	[MARCH 1, 2011]	DATE OF ISSUE
ANNUITANT	[JOHN DOE]	[MARCH 1, 2072]	MATURITY DATE
AGE OF ANNUITANT	[35]		
BENEFICIARY	[AS STATED IN COPY OF APPLICATION ATTACHED UNLESS SUBSEQUENTLY CHANGED IN COMPLIANCE WITH CONTRACT PROVISIONS]		

FORM	PLAN	SINGLE PREMIUM	NET PREMIUM
Form ASIA10-NQ	SINGLE PREMIUM FIXED AND INDEXED DEFERRED ANNUITY	[\$10,000]	[\$10,000]

SPECIFICATIONS

PREMIUM ENHANCEMENT AMOUNT	[\$0]
PREMIUM ENHANCEMENT PERCENTAGE	[0%]
NET CONSIDERATION PERCENTAGE	[90]%
MINIMUM GUARANTEED INTEREST RATE FOR MINIMUM GUARANTEED SURRENDER VALUE	
For Declared Rate Interest Crediting Method	[1.00%]
For Indexed Minimum Interest Crediting Method	[1.00%]

ENDORSEMENTS[DECLARED RATE INTEREST CREDITING METHOD]

Interest Rate for first Contract Year: [2.20%]
Minimum Declared Rate: [1.00%]

[S&P 500® INDEX ONE-YEAR INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[4.0%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-10 [1%]
Thereafter	[1%]
Participation Rate	[100%]

[S&P 500® INDEX ONE-YEAR AVERAGE INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[4.0%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-10 [1%]
Thereafter	[1%]
Participation Rate	[100%]

[RIDERS]

[Return of Premium Rider]

[Enhanced Death Benefit Rider]

[Rider Annual Premium Rate: **[0.25%]**]

[Enhanced Death Benefit Rider Percentage: **[45.0%]**]

[Lifetime Income Rider]

[Rider Annual Premium Rate: **[0.40%]**]

[Lifetime Income Percentage:

income commencing on or after age 60 and before age 70: **[5.00%]**

income commencing on or after age 70 and before age 80: **[6.00%]**

income commencing on or after age 80: **[7.00%]**]

TABLE OF GUARANTEED SURRENDER VALUES

SURRENDER CHARGE SCHEDULE

Based on a Net Premium of \$10,000 at the Date of Issue

Contract Years	Guaranteed Surrender Value
1	9,935.00
2	9,870.00
3	9,805.00
4	9,740.00
5	9,675.00
6	9,610.00
7	9,545.00
8	9,480.00
9	9,415.00
10	9,356.60
11	9,391.02
12	9,426.43
13	9,462.84
14	9,500.27
15	9,538.72
16	9,578.21
17	9,618.74
18	9,660.33
19	9,702.98
20	9,746.71

Contract Years	Surrender Charge Percentage
1	9%
2	9%
3	8%
4	7%
5	6%
6	5%
7	4%
8	3%
9	2%
10	1%
11 +	0%

The values in the table assume no Withdrawals or premium tax, and assume that 100% of the Annuity Value is invested in an account(s) under this contract that use an Indexed Interest Crediting Method. To determine the guaranteed Surrender Value for Net Premiums other than \$10,000, divide the Net Premium by \$10,000 and multiply the result by the appropriate guaranteed Surrender Value above. To the extent that you allocate premiums to the Declared Rate Interest Crediting Method the guaranteed Surrender Value will be greater.

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OWNER	[ANNUITANT]	[12345678]	CONTRACT NUMBER
AGE OF OWNER	[35]	[MARCH 1, 2011]	DATE OF ISSUE
ANNUITANT	[JOHN DOE]	[MARCH 1, 2072]	MATURITY DATE
AGE OF ANNUITANT	[35]		
BENEFICIARY	[AS STATED IN COPY OF APPLICATION ATTACHED UNLESS SUBSEQUENTLY CHANGED IN COMPLIANCE WITH CONTRACT PROVISIONS]		

FORM	PLAN	SINGLE PREMIUM	NET PREMIUM
Form ASIA10-PQ	SINGLE PREMIUM FIXED AND INDEXED DEFERRED ANNUITY	[\$10,000]	[\$10,000]

SPECIFICATIONS

PREMIUM ENHANCEMENT AMOUNT	[\$0]
PREMIUM ENHANCEMENT PERCENTAGE	[0%]
NET CONSIDERATION PERCENTAGE	[90]%
MINIMUM GUARANTEED INTEREST RATE FOR MINIMUM GUARANTEED SURRENDER VALUE	
For Declared Rate Interest Crediting Method	[1.00%]
For Indexed Minimum Interest Crediting Method	[1.00%]

ENDORSEMENTS[DECLARED RATE INTEREST CREDITING METHOD]

Interest Rate for first Contract Year: [2.20%]
Minimum Declared Rate: [1.00%]

[S&P 500® INDEX ONE-YEAR INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[4.0%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-10 [1%]
	Thereafter [1%]
Participation Rate	[100%]

[S&P 500® INDEX ONE-YEAR AVERAGE INTEREST CREDITING METHOD]

[Rates for first Contract Year:

Floor	[0%]
Cap	[4.0%]
Participation Rate:	[100%]

Minimum Guaranteed Renewal Rates:

Floor	[0%]
Cap	Contract Years 2-10 [1%]
	Thereafter [1%]
Participation Rate	[100%]

[RIDERS]

[Return of Premium Rider]

[Enhanced Death Benefit Rider]

[Rider Annual Premium Rate: **[0.25%]**]

[Enhanced Death Benefit Rider Percentage: **[45.0%]**]

[Lifetime Income Rider]

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[Lifetime Income Percentage:

income commencing on or after age 60 and before age 70: **[5.00%]**

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20	9,746.71

Contract Years	Surrender Charge Percentage
1	9%
2	9%
3	8%
4	7%
5	6%
6	5%
7	4%
8	3%
9	2%
10	1%
11 +	0%

The values in the table assume no Withdrawals or premium tax, and assume that 100% of the Annuity Value is invested in an account(s) under this contract that use an Indexed Interest Crediting Method. To determine the guaranteed Surrender Value for Net Premiums other than \$10,000, divide the Net Premium by \$10,000 and multiply the result by the appropriate guaranteed Surrender Value above. To the extent that you allocate premiums to the Declared Rate Interest Crediting Method the guaranteed Surrender Value will be greater.

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